

**BEFORE THE PUBLIC UTILITIES COMMISSION
OF THE STATE OF CALIFORNIA**



FILED

11-14-07
03:17 PM

Order Instituting Rulemaking to Implement the
Commission's Procurement Incentive Framework and
to Examine the Integration of Greenhouse Gas
Emissions Standards into Procurement Policies.

R. 06-04-009

BEFORE THE CALIFORNIA ENERGY COMMISSION

AB 32 Implementation – Greenhouse Gas
Emissions.

Docket 07-OIIP-01

**REPLY COMMENTS OF
THE ALLIANCE FOR RETAIL ENERGY MARKETS
ON THE DISTRIBUTION OF EMISSIONS ALLOWANCES**

Gregory S. G. Klatt
DOUGLASS & LIDDELL
21700 Oxnard Street, Suite 1030
Woodland Hills, California 91367
Telephone: (818) 961-3002
Facsimile: (818) 961-3004
Email: klatt@energyattorney.com

Attorneys for the
ALLIANCE FOR RETAIL ENERGY MARKETS

Date: November 14, 2007

TABLE OF CONTENTS

I.	INTRODUCTION	1
II.	THE METHOD BY WHICH EMISSION ALLOWANCES ARE ALLOCATED TO RETAIL PROVIDERS SHOULD BE FAIR AND EQUITABLE.	4
A.	Allocating Allowances Based Solely on Historical or Current Emissions Would Be Counterproductive, Administratively Complex, and Contentious.	5
B.	Allocating Allowances Based on Projected Retail Sales Would Be Preferable to Using Historical Retail Sales.....	6
C.	Energy Efficiency “Savings” Should Not Be Considered “Retail Sales” for Purposes of Allocating Allowances.	8
D.	SCE’s Proposal to Allocate Allowances Based on “Economic Harm” Deserves Consideration.	8
E.	Initial Allocations Should Be Trued-up for Load Growth and Load Migration.....	9
III.	RETAIL PROVIDERS SHOULD BE ALLOWED TO USE A WIDE RANGE OF “FLEXIBLE COMPLIANCE” TOOLS.	10
IV.	THE TRANSITION TO 100% AUCTIONING OF ALLOWANCES SHOULD BE GRADUAL.	11
V.	AUCTION REVENUES SHOULD BE RETURNED TO RETAIL PROVIDERS OR THEIR CUSTOMERS ON A PROPORTIONAL BASIS.....	12
VI.	CONCLUSION.....	13

**BEFORE THE PUBLIC UTILITIES COMMISSION
OF THE STATE OF CALIFORNIA**

Order Instituting Rulemaking to Implement the
Commission's Procurement Incentive Framework and
to Examine the Integration of Greenhouse Gas
Emissions Standards into Procurement Policies.

R. 06-04-009

BEFORE THE CALIFORNIA ENERGY COMMISSION

AB 32 Implementation – Greenhouse Gas
Emissions.

Docket 07-OIIP-01

**REPLY COMMENTS OF
THE ALLIANCE FOR RETAIL ENERGY MARKETS
ON THE DISTRIBUTION OF EMISSIONS ALLOWANCES**

In accordance with the Administrative Law Judge's Ruling Requesting Comments and Noticing Workshop on Allowance Allocation Issues dated October 15, 2007 ("ALJ's Ruling"), the Alliance for Retail Energy Markets ("AReM") respectfully submits its reply to the opening comments on issues relating to the distribution of greenhouse gas ("GHG") emission allowances under a load-based system.¹

I. INTRODUCTION

AReM's members are energy service providers ("ESPs") that would be most directly affected by the regulation of greenhouse gas ("GHG") emissions in the electricity sector at the retail provider level (i.e., a load-based system), and AReM's opening

¹ AReM is a California non-profit mutual benefit corporation formed by energy service providers that are active in California's direct access market. The positions taken in this filing represent the views of AReM but not necessarily those of individual members or affiliates of its members with respect to the issues addressed herein.

comments focused on issues that would impact ESPs under such a system. Given the large number of parties that submitted opening comments and the widely varying interests they represent, it is unsurprising that the recommendations presented in the opening comments cover the full spectrum of options. Notably, however, there appears to be broad agreement regarding key features of a load-based system among the parties that are most concerned about the potential impact of GHG regulations on consumers, including the Division of Ratepayer Advocates (“DRA”), The Utility Reform Network (“TURN”), Pacific Gas and Electric Company (“PG&E”), Southern California Edison Company (“SCE”), San Diego Gas & Electric Company (“SDG&E”), Los Angeles Department of Water and Power (“LADWP”), Modesto Irrigation District (“MID”), the Western Power Trading Forum (“WPTF”), and AReM. While there are some differences of opinion among these parties regarding certain details (and not every party commented on every issue), areas of broad agreement include the following:

- Administrative allocation should be the primary means by which emission allowances are distributed to retail providers during the early years of the program.
- Administrative allocations should be adjusted periodically to account for load migration.
- New market entrants should have access to allowances either through set-asides or as a function of the allocation process.
- Retail providers should be allowed to use flexible compliance.
- The transition to allowance auctions should be gradual.

In this reply, AReM will comment on the various proposals concerning the method by which emission allowances could be allocated to retail providers, the need for a true-up mechanism to account for load migration, the need for flexible compliance, the risks of moving too rapidly toward 100% auctioning of allowances, and the various proposals concerning the use of auction revenues. AReM's comments are limited to these program elements under a load-based system.² In summary, AReM recommends:

- For fairness and policy reasons, allowances should be allocated to retail providers in proportion to their relative shares of *projected* retail sales or, possibly, the estimated “economic harm” resulting from GHG regulation. AReM recommends that a separate workshop be held on this topic.
- If allocations are based on retail sales, energy efficiency savings should not be considered since the investor-owned utilities (“IOUs”) are already compensated for the corresponding reductions in their retail sales, and direct access customers not only help fund the IOUs’ energy efficiency programs but are also responsible for a significant portion of the load reductions under those programs.
- Allocations to individual retail providers should be trued-up for load migration on a regular basis (monthly or, at a minimum, quarterly), particularly given the possibility that the direct access market will be reopened when the state’s cap and trade program is in place.
- Retail providers should be allowed a wide range of “flexible compliance” options.

² Since AReM's members would not be significantly affected by GHG regulation under a “deliverer/first seller” system, AReM is not commenting on the various proposals specific to such a system.

- The transition to 100% auctioning of allowances should be gradual so as to protect against market power abuse and mitigate consumer costs.
- Auction revenues should be allocated among retail providers in proportion to their share of load, and the ultimate disposition of the revenues allocated to each retail provider should be left to its discretion.

II. THE METHOD BY WHICH EMISSION ALLOWANCES ARE ALLOCATED TO RETAIL PROVIDERS SHOULD BE FAIR AND EQUITABLE.

Methods for the administrative allocation of emission allowances to retail providers proposed in the opening comments include proportional allocations based on:

- (1) Projected retail sales (AReM);
- (2) Projected retail sales and energy efficiency savings (DRA);
- (3) “Current” (historical) retail sales and energy efficiency savings (PG&E);
- (4) “Economic harm” (SCE);
- (5) Current emissions (LADWP); and
- (6) Historical emissions (MID).

For the reasons explained below, AReM recommends that allowances be allocated to retail providers in proportion to their shares of projected retail sales (without consideration of energy efficiency savings) or, possibly, the “economic harm” (i.e., increased costs) resulting from GHG regulation.

A. Allocating Allowances Based Solely on Historical or Current Emissions Would Be Counterproductive, Administratively Complex, and Contentious.

AReM strongly opposes proposals to allocate GHG emission allowances to retail providers based simply on the historical or current emissions of their resource portfolios, without any consideration of a retail provider's market share or other important factors. As TURN, PG&E and other parties pointed out in their opening comments, the State of California has already determined as a matter of public policy that allowances should not be allocated based solely on historical emissions since that "will only serve to reward the biggest polluters at the expense of consumers and penalize early leadership."³ Under a load-based system, retail providers that procure a significant portion of their power from resources with higher GHG emissions (e.g., coal-fired generation) would be rewarded at the expense of those that have invested in or procure power from zero or low-emissions resources, in that the former would receive a proportionally greater share of allowances.

That would be particularly unfair to ESPs, which typically purchase most of their energy through contracts for the output from relatively low-emitting gas-fired resources and relatively clean "system" power. It would also be unfair to those LSEs, including several ESPs, with customers that voluntarily purchase "green" energy or have installed distributed generation facilities with low emissions. It would also punish LSEs that meet the State's goal of 20% of retail sales from renewable energy by 2010. Indeed, basing allocations solely on historical or current emissions will create a disincentive for retail providers with high emissions profiles to reduce their emissions or invest in new renewable resources and emissions reduction technologies.

³ State of California, Recommendations for Federal Climate Policy.

Lastly, as PG&E has pointed out, the allocation process itself would be administratively complex and contentious, as regulators would have to assign responsibility to LSEs individually for the emissions from merchant generators and short-term imports, in many cases without there being a clear “line-of-sight” between the source of emissions and a particular LSE.

B. Allocating Allowances Based on Projected Retail Sales Would Be Preferable to Using Historical Retail Sales.

AReM believes that using projected retail sales as the basis for allowance allocations is preferable to using historical sales. Historical sales would be a reasonable basis for allocating allowances if all of the retail providers in California were public utilities and all of their customers were captive. However, that is not the existing market paradigm. Retail customers of PG&E, SCE and SDG&E have the option of purchasing their power from an ESP or a community choice aggregator (“CCA”).⁴ While the proportional share of statewide load served by each of the utilities has been fairly constant over time, the load served by individual ESPs (and future CCAs) can vary significantly from year to year. This phenomenon could be even more pronounced if and the direct access market is reopened, a possibility the Commission is currently exploring. If allowances for a particular year are allocated on the basis of historical sales and the load served by an ESP (or a CCA) increases significantly before or during the compliance year, the ESP (or CCA) will need to secure a significant amount of additional allowances

⁴ Although the right of customers to elect direct access service was suspended in 2001, customers that had direct access arrangements in place at the time the suspension went into effect remain eligible for direct access service. Those customers account for more than ten percent of the load in the utilities’ service territories. Moreover, the suspension of direct access is not permanent, and the Commission is currently conducting proceedings on reopening the direct access market. And while no CCAs are currently providing service to customers, several are in the process of being formed.

in the secondary market, potentially at a very high cost, due to market illiquidity in the early years of a cap and trade program.

This highlights the need for the administrative allocation process to include a true-up process, whether the initial allocations are based on historical sales or projected sales. An advantage of basing allocations on projected sales, however, is that the magnitude of adjustments to the allocations to ESPs and CCAs would be much smaller than if the allocations were based on historical sales. That is because the total load that is expected to be served by ESPs (and CCAs) would be known in advance. As a result, the amount of allowances that would have to be reallocated from the utilities to (ESPs or CCAs) should be much less than if the initial allocations were based on historical sales data.

Some parties have expressed concern that allocating allowances on the basis of projected sales would create an incentive for an LSE to inflate its sales forecast in order to receive a larger allocation. However, there is a simple solution to this potential problem: Use the same load forecast that is used to determine an LSE's resource adequacy obligations as the basis for the LSE's allocation of emission allowances.⁵ Since an LSE's resource adequacy obligations would most likely be higher under an inflated forecast, it would have a strong incentive to submit an accurate forecast.

⁵ Under state law, IOUs, ESPs and CCAs are subject to resource adequacy requirements established by the Commission. As part of the reporting requirements for the Commission's resource adequacy program, these LSEs are required to submit hourly load forecasts to the Energy Commission, which calculates the resource adequacy requirements for each LSE. While the resource adequacy requirements are for capacity, not energy, each LSE's resource adequacy requirements are determined based largely on their hourly load forecast. Publicly-owned utilities are subject to similar requirements under the CAISO's tariffs.

C. Energy Efficiency “Savings” Should Not Be Considered “Retail Sales” for Purposes of Allocating Allowances.

Assuming allowances are allocated on the basis of retail sales, AReM opposes the proposals to count load reductions attributable to energy efficiency programs administered by the IOUs as retail sales. While there obviously is a connection between reduced consumption from energy efficiency measures and reduced GHG emissions, it would be unreasonable and unfair to reward the IOUs for energy efficiency savings with increased allocations of emission allowances. The utilities are already paid handsomely for each MWh that is not consumed due to the energy efficiency programs they administer, and it would be unreasonable to allow the IOUs to double-count those MWh for purposes of the allocation of GHG emission allowances. Double-counting of energy efficiency savings by the IOUs would be particularly unfair to ESPs and their customers, given that direct access customers help fund the utilities’ energy efficiency programs and are responsible for a significant portion of the energy efficiency savings achieved thereby. If energy efficiency savings are to be treated as retail sales for purposes of allowance allocations, then all LSEs whose customers fund those programs should be credited with proportional shares of those benefits.

D. SCE’s Proposal to Allocate Allowances Based on “Economic Harm” Deserves Consideration.

While AReM is opposed to allocating allowances *solely* on the basis of historical or current emissions, AReM believes that SCE’s proposal to allocate allowances to LSEs based on their share of the “economic harm” (i.e., increased costs) resulting from GHG regulations, as calculated based on historical and/or current emissions and wholesale purchases, deserves further consideration. AReM has not fully analyzed SCE’s proposal,

but believes that it could result in allocations to the different types of LSEs that are even more fair and equitable than allocations based on retail sales alone. AReM therefore recommends that a workshop be held to allow parties to examine SCE's proposal in more detail.

E. Initial Allocations Should Be Trued-up for Load Growth and Load Migration.

Whatever metric or formula may be used to allocate allowances to retail providers, AReM strongly agrees with DRA and the utilities that the allocations to individual LSEs should be adjusted periodically to account for load growth and load migration. Load growth is less of a concern for ESPs while the suspension of direct access remains in effect. However, load migration can and does have a material effect on the load served by individual ESPs. That is because ESPs contract with customers on an individual basis. Customers can move to a different ESP at the end of their contracts, and customers that are on bundled service but remain eligible for direct access can move to direct access at the end of their minimum three-year commitments. Therefore, as noted previously, individual ESPs can experience significant changes in their customer base, and thus their loads, from year to year and even month to month.

Load growth and load migration could be even more significant factors for ESPs if the direct access market is reopened, a possibility the Commission is actively considering. Currently, there is an effective cap on the total amount of load that is eligible for direct access. If the direct access market is reopened, however, this de facto cap on direct access load growth will either be eliminated or increased, as ESPs would be allowed to serve new load added by existing direct access customers and new customers will become eligible for direct access.

If the allocations of allowances to individual LSEs are set in stone for the duration of the compliance period, then LSEs that gain load would be punished and those that lose load would be rewarded. While some ESPs could benefit from this approach to the extent they lose load during the compliance period, the primary winners would most likely be the IOUs, particularly if the direct access market is reopened and load migrates to ESPs. Accordingly, fairness dictates that allowance allocations be adjusted to account for both load growth and load migration.

The frequency that allowances allocations should be adjusted will depend in part on the length of each compliance period. Assuming the compliance period is 12 months, AReM recommends that the true up of allocations be performed on a monthly basis. At a minimum, there should be quarterly true ups, whether the compliance timeframe is 12 months or some longer period.

III. RETAIL PROVIDERS SHOULD BE ALLOWED TO USE A WIDE RANGE OF “FLEXIBLE COMPLIANCE” TOOLS.

Under a load-based system, retail providers in general and smaller LSEs in particular will face challenges in meeting GHG emissions reduction goals similar to those they face in complying with RPS requirements, including potential market power abuse, limited availability of desired resources, delays in new resources coming on line, a “building block” supply curve, and price volatility. To mitigate the effect of these barriers to RPS compliance, the Commission allows LSEs to utilize a variety of “flexible compliance” tools, including banking excess procurement and carrying over procurement deficits. AReM strongly agrees with DRA and other parties that recommend a similar approach with respect to compliance with GHG emissions reduction requirements. More specifically, LSEs should be allowed unlimited banking of excess emission allowances,

the carry over of allowance deficits for up to three years, and the use of emission offsets. Allowing LSEs to utilize these options will facilitate compliance by smaller LSEs, mitigate customer costs, and promote long-term investments in GHG reductions.

IV. THE TRANSITION TO 100% AUCTIONING OF ALLOWANCES SHOULD BE GRADUAL.

Philosophically and as a practical matter, AReM believes that market solutions to public policy objectives are superior to “command-and-control” regulation and administratively determined outcomes. Accordingly, AReM supports the transition to 100% auctioning of GHG emission allowances. As several parties have pointed out, however, there are grave risks associated with going to 100% auctioning immediately or too rapidly.

There is little disagreement that the imposition of GHG emission reduction requirements in the electricity sector will significantly increase consumer costs. While the auctioning of allowances would be less complex and more efficient than administrative allocations, and the resulting price signals can be expected to promote more efficient investment in GHG reduction measures, there is a trade off between the benefits from auctions and the increased costs they can be expected to create for consumers. In order to mitigate those costs and allow time for a liquid market for emission allowances to develop, the transition to 100% auctioning of allowances should be gradual. AReM does not have a specific proposal at this time for how long that transition should be or the increments by which auctions should replace administrative allocations. AReM believes, however, that the transition period should be no less than ten years.

V. AUCTION REVENUES SHOULD BE RETURNED TO RETAIL PROVIDERS OR THEIR CUSTOMERS ON A PROPORTIONAL BASIS.

There is broad agreement among the parties that directly or indirectly represent customers that at least some portion of auction revenues should be used to mitigate customer costs and invest in GHG reduction measures. To the extent the allowances being auctioned are “owned” by retail providers, fairness dictates that auction revenues be returned to the retail providers on a proportional basis. If under a first-seller system, as some parties propose, allowances are first allocated to retail providers and then auctioned to first sellers, the auction revenues should be returned to retail providers in proportion to their initial allocations. Under a load-based system, auction revenues should be returned to retail providers in proportion to their share of the total amount of allowances that are auctioned.

AReM agrees with SDG&E that the ultimate disposition of the revenues returned to retail providers should be left to the discretion of those entities, rather than being dictated by the Commission or some other regulatory body. Alternatively, the revenues should be returned directly to customer through the utilities’ wires charges, which are paid by all customers. AReM strongly disagrees with TURN’s suggestion that bundled customers should receive a greater share of auction revenues than direct access customers. Bundled customers and direct access customers pay the same charges for public purposes programs, and should therefore receive the same auction benefits.

VI. CONCLUSION

For the foregoing reasons, AReM urges the adoption of the recommendations set forth in its opening comments and these reply comments.

Respectfully submitted,



Gregory S.G. Klatt

DOUGLASS & LIDDELL
21700 Oxnard Street, Suite 1030
Woodland Hills, California 91367
Telephone: (818) 961-3002
Facsimile: (818) 961-3004
Email: klatt@energyattorney.com

Attorneys for the
ALLIANCE FOR RETAIL ENERGY MARKETS

Date: November 14, 2007

CERTIFICATE OF SERVICE

I hereby certify that I have this day served a copy of the **Reply Comments of the Alliance For Retail Energy Markets on the Distribution of Emissions Allowances** on all parties of record in R.06-04-009 by serving an electronic copy on their email addresses of record and by mailing a properly addressed copy by first-class mail with postage prepaid to each party for whom an email address is not available.

Executed on November 14, 2007, at Woodland Hills, California.



Michelle Dangott

SERVICE LIST

R.06-04-009

cadams@covantaenergy.com
steven.schleimer@barclayscapital.com
steven.huhman@morganstanley.com
rick_noger@praxair.com
keith.mccrea@sablaw.com
ajkatz@mwe.com
ckrupka@mwe.com
lisa.decker@constellation.com
cswoollums@midamerican.com
kevin.boudreaux@calpine.com
trdill@westernhubs.com
ej_wright@oxy.com
pseby@mckennalong.com
todil@mckennalong.com
steve.koerner@elpaso.com
jenine.schenk@apses.com
jbw@slwplc.com
kelly.barr@srpnet.com
rrtaylor@srpnet.com
smichel@westernresources.org
roger.montgomery@swgas.com
Lorraine.Paskett@ladwp.com
ron.deaton@ladwp.com
snewsom@semprautilities.com
dhuard@manatt.com
curtis.kebler@gs.com
dehling@klng.com
gregory.koiser@constellation.com
npedersen@hanmor.com
mmazur@3phasesRenewables.com
vitaly.lee@aes.com
tiffany.rau@bp.com
klatt@energyattorney.com
rhelgeson@scppa.org
douglass@energyattorney.com
pssed@adelphia.net
akbar.jazayeri@sce.com
annette.gilliam@sce.com
cathy.karlstad@sce.com
Laura.Genao@sce.com
rkmoore@gswater.com
dwood8@cox.net
amsmith@sempra.com
atrial@sempra.com
apak@sempraglobal.com
dhecht@sempratradng.com
daking@sempra.com
svongdeuane@semprasolutions.com
troberts@sempra.com

liddell@energyattorney.com
marcie.milner@shell.com
rwinthrop@pilotpowergroup.com
tdarton@pilotpowergroup.com
lschavrien@semprautilities.com
GloriaB@anzaelectric.org
llund@commerceenergy.com
thunt@cecmil.org
diane_fellman@fpl.com
jeanne.sole@sfgov.org
john.hughes@sce.com
llorenz@semprautilities.com
marcel@turn.org
nsuetake@turn.org
dil@cpuc.ca.gov
fjs@cpuc.ca.gov
achang@nrdc.org
rsa@a-klaw.com
ek@a-klaw.com
kgrenfell@nrdc.org
mpa@a-klaw.com
sls@a-klaw.com
bill.chen@constellation.com
bk7@pge.com
epoole@adplaw.com
agrimaldi@mckennalong.com
bcragg@goodinmacbride.com
jsqueri@gmsr.com
jarmstrong@goodinmacbride.com
kbowen@winston.com
lcottle@winston.com
sbeatty@cwclaw.com
vprabhakaran@goodinmacbride.com
jkarp@winston.com
jeffgray@dw.com
cjlw5@pge.com
ssmyers@att.net
lars@resource-solutions.org
alho@pge.com
aweller@sel.com
jchamberlin@strategicenergy.com
beth@beth411.com
kerry.hattevik@mirant.com
kowalewsia@calpine.com
wbooth@booth-law.com
hoerner@redefiningprogress.org
janill.richards@doj.ca.gov
cchen@ucsusa.org
gmorris@emf.net

tomb@crossborderenergy.com
kjinnovation@earthlink.net
bmcc@mccarthyllaw.com
sberlin@mccarthyllaw.com
Mike@alpinenaturalgas.com
joyw@mid.org
UHelman@caiso.com
jjensen@kirkwood.com
mary.lynn@constellation.com
lrdevanna-rf@cleanenergysystems.com
abb@eslawfirm.com
mclaughlin@braunlegal.com
glw@eslawfirm.com
jluckhardt@downeybrand.com
jdh@eslawfirm.com
vwelch@environmentaldefense.org
www@eslawfirm.com
westgas@aol.com
schohn@smud.org
atrowbridge@daycartermurphy.com
dansvec@hdo.net
notice@psrec.coop
deb@a-klaw.com
cynthia.schultz@pacificorp.com
kyle.l.davis@pacificorp.com
ryan.flynn@pacificorp.com
carter@ieta.org
jason.dubchak@niskags.com
bjones@mjbbradley.com
kcolburn@symbioticstrategies.com
rapcowart@aol.com
Kathryn.Wig@nrgenergy.com
sasteriadis@apx.com
george.hopley@barcap.com
ez@pointcarbon.com
burtraw@rff.org
vb@pointcarbon.com
kyle_boudreaux@fpl.com
andrew.bradford@constellation.com
gbarch@knowledgeinenergy.com
ralph.dennis@constellation.com
smindel@knowledgeinenergy.com
brabe@umich.edu
bpotts@foley.com
james.keating@bp.com
Cynthia.A.Fonner@constellation.com
jimross@r-c-s-inc.com
tcarlson@reliant.com
ghinners@reliant.com

zaiontj@bp.com
julie.martin@bp.com
fiji.george@elpaso.com
echiang@elementmarkets.com
fstern@summitblue.com
nenbar@energy-insights.com
nlenssen@energy-insights.com
bbaker@summitblue.com
william.tomlinson@elpaso.com
kjsimonsen@ems-ca.com
Sandra.ely@state.nm.us
bmcquown@reliant.com
dbrooks@nevp.com
anita.hart@swgas.com
randy.sable@swgas.com
bill.schrand@swgas.com
jj.prucnal@swgas.com
sandra.carolina@swgas.com
ckmitchell1@sbcglobal.net
chilen@sppc.com
emello@sppc.com
tdillard@sierrapacific.com
dsoyars@sppc.com
jgreco@caithnessenergy.com
fluchetti@ndep.nv.gov
leilani.johnson@ladwp.com
randy.howard@ladwp.com
Robert.Rozanski@ladwp.com
robert.pettinato@ladwp.com
HYao@SempraUtilities.com
rprince@semprautilities.com
rkeen@manatt.com
nwhang@manatt.com
pjazayeri@stroock.com
derek@climaterestry.org
david@nemtzw.com
harveyederpspc.org@hotmail.com
sendo@ci.pasadena.ca.us
slins@ci.glendale.ca.us
thamilton5@charter.net
bjeider@ci.burbank.ca.us
rmorillo@ci.burbank.ca.us
roger.pelote@williams.com
aimee.barnes@ecosecurities.com
case.admin@sce.com
tim.hemig@nrgenergy.com
bjl@bry.com
aldyn.hoekstra@paceglobal.com
ygross@sempraglobal.com
jlaun@apogee.net
kmkiener@fox.net
scottanders@sandiego.edu
jkloberdanz@semprautilities.com
andrew.mcallister@energycenter.org

jack.burke@energycenter.org
jennifer.porter@energycenter.org
sephra.ninow@energycenter.org
dniehaus@semprautilities.com
jleslie@luce.com
ofoote@hkcf-law.com
ekgrubaugh@iid.com
pepper@cleanpowermarkets.com
gsmith@adamsbroadwell.com
mdjoseph@adamsbroadwell.com
hayley@turn.org
mflorio@turn.org
Dan.adler@calcef.org
mhyams@sfwater.org
tburke@sfwater.org
norman.furuta@navy.mil
amber@ethree.com
annabelle.malins@fco.gov.uk
dwang@nrdr.org
filings@a-klaw.com
nes@a-klaw.com
obystrom@cera.com
sdhilton@stoel.com
scarter@nrdr.org
abonds@thelen.com
cbasket@enernoc.com
colin.petheram@att.com
jwmctarnaghan@duanemorris.com
kfox@wsgr.com
kkhoja@thelenreid.com
pvallen@thelen.com
spauker@wsgr.com
rreinhard@mofo.com
cem@newsdata.com
hgolub@nixonpeabody.com
jscancarelli@flk.com
jwiedman@goodinmacbride.com
mmattes@nossaman.com
jen@cnt.org
lisa_weinzimer@platts.com
steven@moss.net
sellis@fypower.org
arno@recurrentenergy.com
ELL5@pge.com
gx12@pge.com
jxa2@pge.com
JDF1@PGE.COM
RHHJ@pge.com
sscb@pge.com
svs6@pge.com
S1L7@pge.com
vjw3@pge.com
karla.dailey@cityofpaloalto.org
farrokh.albuyeh@oati.net

dtibbs@aes4u.com
jhahn@covantaenergy.com
andy.vanhorn@vhcenergy.com
Joe.paul@dynegy.com
info@calseia.org
gblue@enxco.com
sbeserra@sbcglobal.net
monica.schwebs@bingham.com
phanschen@mofo.com
josephhenri@hotmail.com
pthompson@summitblue.com
dietrichlaw2@earthlink.net
Betty.Seto@kema.com
JerryL@abag.ca.gov
jody_london_consulting@earthlink.net
steve@schiller.com
mrw@mrwassoc.com
rschmidt@bartlewells.com
adamb@greenlining.org
stevek@kromer.com
clyde.murley@comcast.net
brenda.lemay@horizonwind.com
carla.peterman@gmail.com
elvine@lbl.gov
rhwisner@lbl.gov
C_Marnay@lbl.gov
philm@scdenergy.com
rita@ritanortonconsulting.com
cpechman@powereconomics.com
emahlon@ecoact.org
richards@mid.org
rogerv@mid.org
tomk@mid.org
fwmonier@tid.org
brbarkovich@earthlink.net
johnrredding@earthlink.net
clark.bernier@rlw.com
rmccann@umich.edu
cmkehrein@ems-ca.com
e-recipient@caiso.com
grosenblum@caiso.com
rsmutny-jones@caiso.com
saeed.farrokhpay@ferc.gov
david@branchcomb.com
kenneth.swain@navigantconsulting.com
kdusel@navigantconsulting.com
gpickering@navigantconsulting.com
lpark@navigantconsulting.com
davidreynolds@ncpa.com
scott.tomashefsky@ncpa.com
ewolfe@resero.com
Audra.Hartmann@Dynegy.com
Bob.lucas@calobby.com
curt.barry@iwpnews.com

danskopec@gmail.com
dseperas@calpine.com
dave@ppallc.com
dkk@eslawfirm.com
wynne@braunlegal.com
kgough@calpine.com
kellie.smith@sen.ca.gov
kdw@woodruff-expert-services.com
mwaugh@arb.ca.gov
pbarthol@energy.state.ca.us
pstoner@lgc.org
rachel@ceert.org
bernardo@braunlegal.com
steven@lipmanconsulting.com
steven@iepa.com
wtasat@arb.ca.gov
etiedemann@kmtg.com
ltenhope@energy.state.ca.us
bushinskyj@pewclimate.org
lmh@eslawfirm.com
obartho@smud.org
bbeebe@smud.org
bpurewal@water.ca.gov
dmacmll@water.ca.gov
kmills@cfbf.com
karen@klindh.com
ehadley@reupower.com
Denise_Hill@transalta.com
sas@a-klaw.com
egw@a-klaw.com
akelly@climatetrust.org
alan.comnes@nrgenergy.com

lisa.c.schwartz@state.or.us
cbreidenich@yahoo.com
dws@r-c-s-inc.com
jesus.arredondo@nrgenergy.com
charlie.blair@delta-ee.com
karen.mcdonald@powerex.com
clarence.binninger@doj.ca.gov
david.zonana@doj.ca.gov
agc@cpuc.ca.gov
aeg@cpuc.ca.gov
blm@cpuc.ca.gov
cfl@cpuc.ca.gov
cft@cpuc.ca.gov
tam@cpuc.ca.gov
dsh@cpuc.ca.gov
edm@cpuc.ca.gov
cpe@cpuc.ca.gov
hym@cpuc.ca.gov
hs1@cpuc.ca.gov
jm3@cpuc.ca.gov
jnm@cpuc.ca.gov
jbf@cpuc.ca.gov
jk1@cpuc.ca.gov
jst@cpuc.ca.gov
jtp@cpuc.ca.gov
jol@cpuc.ca.gov
jci@cpuc.ca.gov
jf2@cpuc.ca.gov
krd@cpuc.ca.gov
lrm@cpuc.ca.gov
ltt@cpuc.ca.gov
mjd@cpuc.ca.gov

rmm@cpuc.ca.gov
ram@cpuc.ca.gov
smk@cpuc.ca.gov
sgm@cpuc.ca.gov
svn@cpuc.ca.gov
scr@cpuc.ca.gov
tcx@cpuc.ca.gov
ken.alex@doj.ca.gov
ken.alex@doj.ca.gov
bdicapo@caiso.com
jsanders@caiso.com
jgill@caiso.com
ppettingill@caiso.com
mscheibl@arb.ca.gov
epowers@arb.ca.gov
jdoll@arb.ca.gov
pburmich@arb.ca.gov
bblevins@energy.state.ca.us
dmetz@energy.state.ca.us
deborah.slone@doj.ca.gov
dks@cpuc.ca.gov
kgriffin@energy.state.ca.us
ldecarlo@energy.state.ca.us
mprior@energy.state.ca.us
californiadockets@pacificorp.com
Philip.H.Carver@state.or.us
samuel.r.sadler@state.or.us
pw1@cpuc.ca.gov
psp@cpuc.ca.gov
pzs@cpuc.ca.gov
kyle.silon@ecosecurities.com
ner@cpuc.ca.gov